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UBER TECHNOLOGIES, INC.
and OTTOMOTTO LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

v.

UBER TECHNOLOGIES, INC.,
OTTOMOTTO LLC; OTTO TRUCKING LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF MARTHA GOODMAN
IN SUPPORT OF PLAINTIFF WAYMO'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL ITS MOTION IN LIMINE
NO. 17 (DKT. 1558)**

Judge: Hon. William H. Alsup
Trial Date: October 10, 2017

I, Martha L. Goodman, declare as follows:

1. I am an associate at the law firm Boies Schiller Flexner LLP representing Defendants Uber Technologies Inc. and Ottomotto LLC (collectively, “Uber”) in this matter. I am a member in good standing of the Bar of the District of Columbia. I make this declaration in support of Plaintiff’s Administrative Motion to File Under Seal Its Motion in Limine No. 17 (Dkt. 1558). I make this declaration based on personal knowledge and if called as a witness, I could and would competently testify to the matters set forth herein.

2. I have reviewed the following documents and confirm that only the portions identified below merit sealing:

Document	Portions to Be Filed Under Seal
Defendants’ Opposition to Waymo’s Motion in Limine No. 17 (“Defendants Opposition”)	Blue-highlighted portions
Exhibit 1 to the Nardinelli Declaration ISO Waymo’s Motion in Limine No. 17	Entire Document
Exhibit 2 to the Nardinelli Declaration ISO Waymo’s Motion in Limine No. 17	Entire Document
Exhibit 3 to the Nardinelli Declaration ISO Waymo’s Motion in Limine No. 17	Blue-highlighted portions
Exhibit 50 to the Goodman Declaration ISO Defendants’ Opposition to Waymo’s Motion in <i>Limine</i> No. 17	Entire Document
Exhibit 52 to the Goodman Declaration ISO Defendants’ Opposition to Waymo’s Motion in <i>Limine</i> No. 17	Entire Document

3. The blue- highlighted portions of Defendants’ Opposition and Exhibit 3 to the Nardinelli declaration and the entirety of Exhibits 1 and 2 to the Nardinelli declaration, and Exhibits 50 and 52 to the Goodman declaration contain confidential or highly confidential information regarding Uber’s LiDAR development and Uber’s internal deliberative processes regarding the same. This information is not publicly known, and its confidentiality is strictly maintained. Disclosure of this information could allow competitors to obtain a competitive advantage over Uber by giving them details into Uber’s internal development of LiDAR and plans for further development, , which would allow competitors to understand Uber’s LiDAR development, and allow them to tailor their own strategy. If such information were made public, Uber’s competitive standing could be significantly harmed.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 18th day of September, 2017, in Washington, DC.

Martha L. Goodman

I, Karen L. Dunn, am the ECF User whose ID and password are being used to file this Declaration. In compliance with General Order 45, X.B., I hereby attest that Martha L. Goodman has concurred in this filing.

Karen L. Dunn